

CODE OF ETHICS
OF
THE OPENAFS FOUNDATION, INC.
(a Pennsylvania Nonprofit Corporation)

Adopted May 20, 2013

This Code of Ethics applies to all of the organization's staff, whether full-time, part-time, or temporary employees, to all volunteers, to all who provide contract services, and to all officers and directors. What is presented here is intended to serve as a summary of OpenAFS policy objectives and work requirements in the daily conduct of its operations. With this in mind, the contents have been prepared to serve as a direct statement of policy and required conduct.

FUNDAMENTAL CONDUCT REQUIREMENTS:

Since its inception, OpenAFS has pursued a policy of honesty and integrity. This policy shall be scrupulously pursued in the future so as to preserve the organization's reputation and its relations with the public.

Everyone throughout the OpenAFS organization shall comply with all applicable laws in performing their work. The duty to obey the law includes the duty to be aware of applicable laws. All representatives shall conduct their activities on behalf of the organization with honesty and integrity.

No code can provide specific answers for all questions relating to ethical standards, so each individual must accept responsibility for his/her own actions.

All must not only observe the policy set forth in the code in any new activities undertaken, but must also regularly review activities and arrangements which were undertaken in the past and which are still continuing.

Everyone must be free from any relationships that might conflict with the best interest of OpenAFS. All forms of "conflict of interest" must be strictly avoided.

Existing proposed or potential relationships that might involve a conflict of interest should be reported immediately to the Board of Directors.

RELATIONS WITH PRIME CONTRACTORS, VENDORS, SUBCONTRACTORS, AND AGENTS:

It is the policy of OpenAFS that no funds or anything else of value shall be paid, loaned, given, or otherwise transferred, directly or indirectly, to or from any owner, officer,

employee, or agent of a prime contractor, vendor, or subcontractor to secure or retain relationships or to receive any other favored treatment.

No gifts or entertainment of any significant value may be given or received by any OpenAFS representatives or by any member of their immediate family to or from supporters, vendors, government organizations, or any related entity. No gift may be offered to influence the relationship, or be of such value or offered under such circumstances that it may reasonably be perceived for that purpose.

All OpenAFS representatives are specifically directed not to offer or provide any item of value, including meals, to a government officer.

INTERNAL OPERATIONS

No OpenAFS bank account may be established without the express written authorization of the OpenAFS Board of Directors. In addition, only representatives expressly authorized by the Board of Directors, in writing, may execute checks or withdraw funds or proceeds from duly established bank accounts.

All expenses incurred by OpenAFS representatives that are to be reimbursed by OpenAFS should be reasonable, accurately accounted for on the Organization's books, and related directly to OpenAFS activities.

It is OpenAFS's policy that OpenAFS representatives are reimbursed for expenses incurred directly from or associated with Organization operations. Travel expenses in connection with OpenAFS operations may only be incurred pursuant to an express authorization from management. All items submitted for reimbursement, including but not limited to travel expenses, should be clearly and accurately described and separately identified on an expense report. Valid original receipts must be submitted.

No OpenAFS representatives are authorized to procure goods and services without the prior written authorization of an Officer.

No OpenAFS representative, nor any member of their immediate family, will pursue any contracts or assist any third party to derive gains from contracts in which OpenAFS is currently involved in for one year after termination of association with OpenAFS.

OpenAFS endorses the principle that every individual must have a fair and equal opportunity to achieve that individual's own full potential. Pursuant to Title VII of the Civil Rights Act of 1964, as amended, discrimination or harassment in employment due to race, age, color, religion, sex, national origin, handicap or veteran status is strictly forbidden.

Under the Occupational Safety and Health Act (29 USC. #651), the Secretary of Labor and Occupational Safety and Health Administration (O.S.H.A.) has adopted standards for job safety and health applicable to organizations such as OpenAFS.

No OpenAFS representative, nor any member of their immediate family, shall derive any personal gain or assist any third party to derive gain from the possession of OpenAFS data or information which is not yet in the public domain.

COMPLIANCE AND PENALTIES:

Any OpenAFS representatives having knowledge of any actual, contemplated, or suspected violation on any provision or standard of this Code of Ethics shall promptly report the matter to their immediate supervisor or the OpenAFS Executive Director.

OpenAFS shall conduct unannounced internal audits from time to time to ensure compliance with the policy statements and requirements set forth in this Code. All OpenAFS representatives shall cooperate fully with such audit efforts.